

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

JURY DEMAND

**DECLARATION OF JOSEPH SAVERI IN SUPPORT OF PLAINTIFFS' UNOPPOSED
MOTION TO EXTEND THE TIME TO TAKE 30(b)(6) DEPOSITION TESTIMONY
FROM DEFENDANTS CHARLESBANK CAPITAL PARTNERS LLC AND BAIN
CAPITAL PRIVATE EQUITY**

I, Joseph Saveri, declare the following under penalty of perjury:

1. I am the Founder and Managing Partner of the Joseph Saveri Law Firm, LLP., counsel for Plaintiffs Jessica Jones, Michelle Velotta, and Christina Lorenzen (collectively, "Plaintiffs"), in Jones v. Bain Capital Private Equity, case no. 2:20-cv-02892-SHL-tmp ("Jones Action"). I am a member in good standing of the State Bar of California and have been admitted pro hac vice in the United States District Court for the Western District of Tennessee, Western Division. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify competently to them. I write this declaration in support of Plaintiffs' Motion for Leave to Take Depositions of Defendants Charlesbank and Bain ("Motion").

2. I am one of the principal attorneys representing Plaintiffs in this action. I have taken a number of the depositions in this matter, including depositions of witnesses employed by

Defendants Charlesbank and Bain, respectively. I am responsible for taking the court ordered 30(b)(6) depositions of Charlesbank and Bain.

3. On June 1, 2022, the Court granted in part Plaintiffs' Motion to Compel 30(b)(6) Deposition Testimony from Defendant Charlesbank Capital Partners LLC and Bain Capital Partners Private Equity. ECF No. 325. The Court ordered that the depositions be completed within 30 days. *Id.*

4. Currently, I am scheduled to attend the American Bar Association International Cartel Workshop in Lisbon, Portugal. It is scheduled to take place June 27-29, 2022. The Workshop is a bi-annual event, recognized as the premier international conference. It is an important professional event and will be attended by one or more of the attorneys representing Defendants in this action. I have long standing plans to attend the event. In connection with the event, I have scheduled a personal vacation in Europe beginning on June 17, 2022. I have made air and hotel reservations in connection with this trip.

5. Due to this scheduling conflict, I, and my firm, have sought agreement with counsel for Defendants to schedule the depositions on July 6 and 7, 2022. Counsel for Defendants have agreed to reschedule the depositions to those dates.

6. Attached as **Exhibit A** is a true and correct copy of an email thread between Elissa Buchanan, Steven Kaiser and David Seidel dated June 2, 2022 through June 10, 2022.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed June 13, 2022 in San Francisco, California.

/s/ Joseph Saveri
Joseph Saveri